

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
RS FIT NW LLC,)	
)	Case No. 20-11568 (KBO)
Debtor.)	
)	(Jointly Administered)
)	
<hr style="border: 0.5px solid black;"/>		
24 HOUR FITNESS WORLDWIDE, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
CONTINENTAL CASUALTY COMPANY;)	Adv. Pro. No. 20-51051 (KBO)
ENDURANCE AMERICAN SPECIALTY)	
INSURANCE COMPANY; STARR SURPLUS)	
INES INSURANCE COMPANY; ALLIANZ)	
GLOBAL RISKS US INSURANCE COMPANY;)	
LIBERTY MUTUAL INSURANCE COMPANY;)	
BEAZLEY-LLOYD'S SYNDICATES 2623/623;)	
ALLIED WORLD NATIONAL ASSURANCE)	
COMPANY; QBE SPECIALTY INSURANCE)	
COMPANY; and GENERAL SECURITY)	
INDEMNITY COMPANY OF ARIZONA,)	
)	
Defendants.)	
)	
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**PROPERTY INSURER DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND
INCORPORATED MEMORANDUM OF LAW**

EXHIBIT A-13

*Email from Dan Larson to Jeremy Gottlieb
RE: COVID-19 (Unconfirmed allegation)
(Deposition of Dan Larson – 30(b)(6), Exhibit 7)
24HF_Production_0081994*

Message

From: Dan Larson [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8E09E4D1326642678C6940F83728CA63-DLARSON]
Sent: 3/13/2020 9:35:23 PM
To: Jeremy Gottlieb (JGottlieb@24hourfit.com) [JGottlieb@24hourfit.com]
Subject: COVID-19 (Unconfirmed allegation)

Hello Jeremy,

So far the handful of alleged COVID-19 cases that were reported by members to the clubs have not been substantiated.

One example I can call on was from our Livermore club where a member called stating that they had COVID-19 and shared that it was reported to the local health departments (2 since he had multiple residence). Between myself and LP we reached out to these health departments to verify the alleged situation. One stated that they couldn't share information with us even though we provided all of the personal information and the other stated that they are familiar with the caller, could not share details, but the concern is minimal and left the impression that they believe the person is an attention seeker.

By attempting to verify these allegations it prevented a knee-jerk reaction which may have caused undue stress and concern for our team members and members at this club. As well as unforeseen media coverage that may harm the 24 Hour Fitness brand.

Dan Larson

Environmental Health & Safety Manager | Risk Management

24 Hour Fitness USA, Inc.

12647 Alcosta Blvd

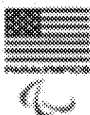
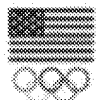
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24hourfitness.com | 24life.com



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EXHIBIT

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Dan Larson

04.28.22

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